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Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13
Michael D. Adams : CASE NO. 20-21676
Debtor : HONORABLE STACEY L. MEISEL

ATTORNEY'S RESPONSE TO TRUSTEE'S CERTIFICATION IN SUPPORT OF DEFAULT

I, Russell L. Low, Esq. hereby certify the following:

1. I, Russell L. Low, Esq. represent the debtor Michael D. Adams in this bankruptcy proceeding.
2. A Certification in Support of Default was entered by Marie-Ann Greeneberg, Chapter 13 Standing Trustee.
3. The last payment was received on 1/25/2022 and the debtor is delinquent as per the Certification in the amount of \$400.00.
4. My legal team reached out to the debtor in an effort to get an explanation on how he would like to cure the arrears.
5. Unfortunately, an answer was not given in time to file an opposition.
6. Therefore, I am respectfully requesting more time to contact the debtor to address the delinquency.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge.

Date: March 2, 2022

/s/ Russell L. Low
Russell L. Low, Esq.
Attorney for Debtor